

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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David E. Patton  
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May 6, 2019

*VIA ECF*

The Honorable P. Kevin Castel  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Wade Hayward*, 19 CR 61 (PKC)

Dear Judge Castel:

I represent Mr. Hayward who is scheduled to appear before the Court on May 30, 2019 for sentencing. I am in receipt of the draft Pre-Sentence Report in which the Probation Department references prior Youth Offender convictions, the records of which were available to the Probation Department but are under seal and, therefore, unavailable to the defense. I am informed by the Probation Department that it cannot release the records to the defense without a Court Order. Therefore, I write to request that the Court order the United States Probation Office to provide me with a copy of all court records and documentation relating to Mr. Hayward's Youthful Offender convictions.

Thank you.

Respectfully submitted,

/s/ Julia Gatto  
Julia L. Gatto  
Assistant Federal Defender  
(212) 417-8750

cc: AUSA Lindsey Keenan (via ECF)